

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



United States
Environmental Protection
Agency

Office of Pesticide Programs

MEMORANDUM

5/8/2019

SUBJECT: Product Chemistry Review for Spy EPA Reg. No.: 5813-REE

FROM: Lynette T. Umez-Eronini

Lynette T. Umez-Eronini

Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510P)

THRU: Karen P. Hicks, Team Leader

Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510P)
Joseph Williams Jr. (Acting Team Leader)

[Signature]

TO: Demson Fuller, PM Team 32 / Benjamin Chambliss
Regulatory Management Branch II
Antimicrobials Division (7510P)

Registrant: The Clorox Co.

Action code: A540

Agency Due Date:

3/22/2019

DP No.: 449553

Submission No.: 1025563

E-Sub No.: 32883

Classification: EP

Process: Nonintegrated
system

Pesticide type: Disinfectant

MRID(s):50669400, 50669401, 50669402

Formulation from label			
PC code(s)	CAS #(s)	Active Ingredient(s)	% weight
014703	7681-52-9	Sodium hypochlorite	4.5
		Other Ingredients	95.5
		Total	100.0

I. BACKGROUND

The Registrant, The Clorox Co., has submitted an application for pesticide registration for their product: Spy EPA Reg. No. 5813-REE.

5813-REE_D449533_Spy

II. RELEVANT DOCUMENTS

	RECEIVED	N/A
EPA FORM 8570-1 Application for Pesticide Registration (10/1/2018)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
EPA FORM 8570-27 – Formulator’s Exemption Statement page 2 of 2 (10/1/2018) and page 1 of 2 (11/14/2018)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
EPA FORM 8570-34 – Certification with Respect to Citation of Data (10/1/2018)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
EPA FORM 8570-35 – Data Matrix (Agency and Public) - (10/1/2018)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Cover letter (10/1/2018)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Transmittal document (10/1/2018)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Proposed CSF BASIC, (9/20/2018) and ALTERNATE A01 (3/14/2019)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Proposed label, (9/13/2018)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Certification for Pilot Fragrance Notification Program	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>
REFERENCED: CSF	--	
Comments:		

III. FINDINGS

a. Product Formulation:

	TGAI	MUP	EUP	Food use	Non-food use
Non-integrated	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Integrated	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Active Ingredients(s)	Nominal		Upper limit	Lower limit	
Sodium hypochlorite	4.5%		6%	4.2%	
	YES		NO	N/A	
1. The certified limits of all ingredients are within 40 CFR standard certified limits.	<input type="checkbox"/>		<input checked="" type="checkbox"/>		
2. Wider certified limits were requested and rationale was accepted.	<input checked="" type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	

3. The nominal concentration(s) of the active ingredient is in agreement with the label.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. The chemical IDs and analytical information for density, pH, and flammability are consistent with Series 830 Group B data.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5. All inert ingredients are approved for non-food use pesticide formulations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. The impurities present >0.1% are identified.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Impurities of toxicological significance have an upper certified limit.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

b. Product Label:

	Yes	NO	N/A
<i>The formula contains one of the following:</i>			
1. 10% or more of petroleum distillate	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. 1.0% or more of methyl alcohol	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Sodium nitrite at any level	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. A toxic list 1 inert at any level	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Arsenic in any form	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. If yes to 1-5, then the inert ingredient list contains a relevant footnote	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Appropriate warning statements regarding flammability or explosive characteristics of the product are included on the label	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. The storage and disposal instructions for the pesticide container are in compliance with PR Notice 84-1 for household use products or PR Notice 83-3 for all other uses.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. The product requires an expiration date at which time the nominal concentration falls below the lower certified limit.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

IV. Additional Findings

Confidential Statement of Formula may be entitled to confidential treatment

1. Request for expanded certified limits for the active ingredient and [REDACTED] inert ingredients is reported in MRID 50669401 (pages 36 of 40 - 39 of 40) and found acceptable.
2. Group A product chemistry data requirements applicable to end-use product have been met (see MRID 50566401 and 50566402 and Table A below).
3. Group B product chemistry data requirements applicable to end-use product have been met (see MRID 50566402 and 50573501 and Table B below), except for 830.6317 Storage Stability and 830.6320 Corrosion Characteristics Studies. Registrant will submit data for the unmet studies no later than one year after the product registered.

5813-REE_D449533_Spy

4. All sources of the active ingredient are EPA registered.
5. Basic CSF, dated 9/28/2018 and Alternate A01 CSF, dated 3/14/2019 are acceptable.

V. Conclusion

The Product Science Branch of Antimicrobials Division finds Basic CSF, dated 9/28/2018 and Alternate A01 CSF, dated 3/14/2019 to be acceptable. Group A Product Chemistry Data requirements have been met. Group B Product Chemistry Data requirements have been met, except the Storage Stability and Corrosion Characteristics studies. The unmet data requirements would be submitted one year after the product registered.

VI. Table A:**Series 830 guidelines – Group A**

OPPTS#	Name	Status	MRID
830.1550	Product Identity & Composition	Acceptable	50669401
830.1600	Description of materials	Acceptable	50669401
830.1620	Description of production process	Not required. Registrant requested waiver.	N/A 50669402
830.1650	Description of formulation process	Acceptable	50669401
830.1670	Discussion of formation of impurities	Not acceptable	N/A
830.1700	Preliminary analysis	Not applicable, non-integrated. Registrant requested waiver.	N/A 50669402
830.1750	Certified limits	Acceptable	50669401
830.1800	Enforcement analytical method	Acceptable	50669401
830.1900	Submittal of samples	Registrant requested waiver. Acceptable	50669402

VII. Table B: Series 830 guidelines – Group B

OPPTS#	Name	Study Findings/Comment			Status	MRID
830.6302	Color	Not required for end use product			Not applicable	N/A
830.6303	Physical state	liquid			Acceptable	50669401
830.6304	Odor	Not required for end use product			Not applicable	N/A
830.6313	Stability to normal & elevated temperatures, metals & metal ions	The product is not TGA1			Not applicable	N/A
830.6314	Oxidation/Reduction	Product is compatible with water, iron powder, 10% potassium permanganate, and kerosene and incompatible with 10% monoammonium phosphate.			Acceptable	50573501
830.6315	Flammability	Waiver requested. Not required since product does not contain combustible liquids.			Acceptable	50669402
830.6316	Explosibility	Waiver requested. Not required since product is not potentially explosive.			Acceptable	50669402
830.6317	Storage stability	Waiver requested. Will submit data no later than one year after the product is registered.			In progress	50669402
830.6319	Miscibility	Waiver requested. Product is not an emulsifiable liquid and is not to be diluted with petroleum solvents.			Acceptable	50669402
830.6320	Corrosion characteristics	Waiver requested. Will submit data no later than one year after the product is registered.			In progress	50669402
830.6321	Dielectric breakdown voltage	Waiver requested. Product is not intended for use around electrical equipment			Acceptable	50669402
830.7000	pH at 25°C	12.94			Acceptable	50669401
830.7050	UV/Visible absorption	Not required for MUP or EP			Not applicable	N/A
830.7100	Viscosity	Avg. Viscosity, cP	Speed, rpm	Temperature, °C	Acceptable	50669401
		18.0	30	20		
		22.6	20	20		
		33.7	10	20		
		8.32	60	40		

5813-REE_D449533_Spy

		8.87	50	40		
		10.5	30	40		
830.7200	Melting point	Not required for MUP or EP			Not applicable	N/A
830.7220	Boiling point	Not required for MUP or EP			Not applicable	N/A
830.7300	Density/relative	1.056 g/ml at 21.2°C			Acceptable	50669401
830.7370	Dissociation constants in water	Not required for MUP or EP			Not applicable	N/A
830.7520	Particle size	Not required for MUP or EP			Not applicable	N/A
830.7550/ 7560/ 7570	Partition coefficient	Not required for MUP or EP			Not applicable	N/A
830.7840/ 7860	Water solubility	Not required for MUP or EP			Not applicable	N/A
830.7950	Vapor pressure	Not required for MUP or EP			Not applicable	N/A